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PARALEGAL
Maria Nunez, B.S.

January 20, 2021

1/21/2021

The requested extensions are granted. The schedule is adopted. SO ORDERED.

Paul A. Russo

Via ECF Only
Honorable Paul Crotty
United State District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: United States of America v. Zhen, et. al.
Case No.: 20-CR-56(PAC)

Your Honor:

This office represents Edward Hernandez, the defendant in the above referenced matter which is pending before the Court. I write on behalf of my client, as well as counsel for the three other defendants, to respectfully request that the Court **extend the schedule to file defense motions until February 18, 2021 and to March 4, 2021 for the Government's response. All defense counsel and counsel for the Government, have conferred and agree to the proposed extended schedule.** We request this extension so that the Government and defendants can continue plea discussions.

Counsel further agrees and requests that time, pursuant to the Speedy Trial Act, be excluded until the adjourned conference date set by the Court.

The Courts consideration of this request is respectfully appreciated. Thank you.

Yours truly,

John Russo

John L. Russo(JR6200)

Cc: AUSA Aline Flodr (via ECF)
All Defense Counsel (via ECF)

